

EXHIBIT L

From: Miglio, Terrence J. [<mailto:timiglio@varnumlaw.com>]
Sent: Tuesday, March 31, 2015 5:48 PM
To: Keith Flynn
Subject: RE: Reeser

The examination would be by an computer forensic expert to obtain:

Better recordings of what you produced.

Other recordings related to the case.

Text messages and calls about her employment,
to/from witnesses/employees of Defendant etc.

Evidence of spoliation

I don't know what you mean by personal documents. I intend to ask her about what you produced after her dep that you should have produced in response to earlier discovery requests.

You offered to allow me to examine the phone? What a joke.

The originals emails will be more legible and may show when and where they were printed.

Interestingly your client and you said there were only 2 recordings related to Henry Ford, yet you produced 19 recordings, numerous text messages and other items. Your client and you had an absolute duty to produce those items long ago. This kind of conduct merits discovery sanctions which I will be asking for.

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